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UNITED STATES OF AMERICA :

SEALED INDICTMENT

$$-V_{\bullet} = \quad \quad \quad :$$

22 Cr.

MARC LARUELLE, :

Defendant. :

22 CRIM 054

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COUNT ONE
(Narcotics Distribution)

The Grand Jury charges:

1. In or about September 1, 2016 through in or about October 2021, in the Southern District of New York and elsewhere, MARC LARUELLE, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was (i) a quantity of mixtures and substances containing a detectable amount of Oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C); (ii) a quantity of mixtures and substances containing a detectable amount of Adderall, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iii) a quantity of mixtures and substances containing a detectable amount of Xanax, in violation of Title 21, United States Code, Section 841(b)(2).

(Title 21, United States Code, Sections 812, 841(a)(1),
841(b)(1)(C), and 841(b)(2).)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, MARC LARUELLE, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provisions

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Brian Gray
FOREPERSON

Damian Williams
DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MARC LARUELLE,

Defendant.

SEALED INDICTMENT

22 Cr. _____

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C),
and 841(b)(2).)

DAMIAN WILLIAMS

United States Attorney

Brian Conley

Foreperson

Sealed Indictment + Arrest warrants
filed before OTW 1/26/22 *K*